1 Magistrate Judge Paula L. McCandlis 2 3 AUG 07 2019 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 IN THE MATTER OF THE SEARCH OF: NO. MJ16-337MAT 10 Instagram Account: DGHOSTBARBER187 11 MOTION REQUESTING EXTENSION OF SEAL OF SEARCH WARRANT AND 12 RELATED MATERIALS 13 14 (FILED UNDER SEAL) 15 16 The United States of America, by and through Brian T. Moran, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant 17 United States Attorney for said District, respectfully requests that this Court extend the 18 seal of the search warrant materials in this matter. 19 20 In August 2016, the Court issued a warrant regarding a particular Instagram account. The Court ordered that the warrant remain under seal until the earliest of the 21 22 following: (a) two weeks following the unsealing of any charging document in a matter for which the warrants were issued; (b) two weeks following the closure of the 23 investigation for which the warrants were issued; or (c) sixteen months following 24 issuance of the warrant, unless the Court, upon motion of the government for good cause, 25 orders an extension of this Order. 26

The warrant pertained to an individual believed to be involved in gun trafficking

located in Barbados. That individual is currently in Barbados, and is believed to be still

Motion to Extend Seal - 1 Instagram Account/MJ16-337MAT

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interested in acquiring firearms from the United States, in violation of U.S. law. The individual does not appear to be aware of the investigation, including that he was 3 communicating with undercover agents. If the individual were to learn of the warrant, he 4 likely would avoid coming to the United States (which is likely how he could be 5 apprehended), and take other steps to frustrate the investigation, including ceasing any 6 future contact with the undercover agents. In light of these circumstances, the 7 government respectfully requests that the seal be extended an additional twelve months. 8 A proposed order is attached for the Court's consideration. 9 DATED this 7<sup>th</sup> day of August, 2019. 10 11 Respectfully submitted, 12 **BRIAN T. MORAN** 13 United States Attorney 14 s/ Thomas M. Woods 15 THOMAS M. WOODS Assistant United States Attorney 16 United States Attorney's Office 17 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 18 Phone: 206-553-7970 19 Fax: 206-553-0755 E-mail: thomas.woods2@usdoj.gov 20 21 22 23 24 25 26 27 28